



COMPLIANCE AUDITS & INVESTIGATIONS POLICY

Version 1.0
Date: April 2019

Approved by Creditinfo Group CEO

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I. Introduction

A. Compliance Policies

Our Creditinfo Compliance Policies define the business and ethical behaviours that we all need to demonstrate when working for Creditinfo Group hf. and any other entity, subsidiary, and/or affiliate within the Group umbrella (the "Group" or "Creditinfo Companies"). They are mandatory. While these are for internal use, we also publish them externally in support of transparency.

Our Compliance Policies are available to the general public at <http://www.creditinfo.com/policies>. However, in certain circumstances, a Policy may use or reveal information which is not available to the general public and which could be considered of some importance internally and/or to Group shareholders, customers, business partners, and others. In such cases, the Policy will not be available at the URL above.

Employees may request a comprehensive list of the Group's Compliance Policies (including any policies that are unavailable at the URL above) via email at compliance@creditinfo.com. Any compliance-related questions may be directed to this inbox.

The Group's Compliance Officer, Carly Souther, can be contacted at +34.691.043.161, or via email at c.souther@creditinfo.com.

B. Why the Group Needs a Compliance Audit & Investigation Policy

The Group must understand and comply with a plethora of laws, rules, and regulations in diverse global markets (including in both developed and emerging countries) and areas of the law (such as employment, intellectual property, tax, finance, consumer protection, and many more).

Given the complex legal environment that applies to every Group organization, it is essential for the Group to conduct voluntary and self-analytical compliance audits on a regular basis. The Group assumes responsibility for policing the internal conduct of employees and contractors, and their compliance with internal policies as well as external laws, rules, and regulations.

Further, as part of the daily activity of the Group, a number of internal and external interactions and transactions take place. During the course of these interactions and transactions, actual, potential or perceived conflicts with Group compliance policies and procedures, as well as external laws, rules, and regulations, may arise. Given this reality, if a compliance issue is identified, at times it may be essential for the Group to conduct compliance investigations.

In light of these realities, compliance audits and investigations are an essential part of the Group's overall compliance program and integral to ensuring the continuity of business operations. Accordingly, it is essential that the Group conduct both general compliance audits on a periodic basis and compliance investigations as needed.

II. Purposes

The purposes of this Policy are to: i) create a duty for all Group employees and contractors to cooperate in good faith with all compliance audits and investigations, and ii) authorise the Group's Compliance Officer to take all measures necessary to enact and enforce the Compliance Audits & Investigation Policy.

III. Scope

This Policy is applicable to all Group employees and contractors and in routinely scheduled compliance audit or in any situation where an actual, potential, or perceived compliance issue arises. Employees must apply this Policy in good faith to preserve the quality and integrity, as well as to ensure the adequacy and effectiveness, of the compliance audit or compliance investigation.

The Group's Compliance Officer defines the rules and guiding principles that apply to internal investigations and compliance audits. The Compliance Officer may (i) determine and define, on an on-going or as-needed basis, what constitutes an actual, potential or perceived compliance issue; (ii) conduct, without restriction, compliance audits and compliance

investigations; (iii) analyze and assess the results of the audit or investigation; and, (iv) determine the appropriate course of action to satisfactorily resolve any identified compliance issue(s); and, (v) provide further details, as it sees fit, regarding what constitutes a compliance issues and how they need to be managed.

IV. Waivers and Exceptions

All Group employees and contractors are subject to compliance with this Policy. Unless explicitly captured in this Policy, there are no exceptions to the Policy.

V. Other Relevant Documents

This Policy must be read in conjunction with not only the Group Code of Conduct, but also with the entire portfolio of Group Compliance policies and procedures.

The Internal Compliance Audit Consent form must be signed by each Group employee and contractor on an annual basis. Employees are responsible for signing, scanning, and sending their forms to the Group's Compliance Officer at compliance@creditinfo.com. The form can be found in Appendix 1 of this Policy.

Appendix 1.

COMPLIANCE AUDITS & INVESTIGATIONS EMPLOYEE CONSENT FORM

Please tick the appropriate boxes and complete the information requested.

1. I will assist the Group's Compliance Officer in good faith in fulfilling its compliance oversight responsibilities to the Group, employees and contractors, shareholders, and others.

Yes No

2. During a compliance audit or compliance investigation, I will assist the Group's Compliance Officer in good faith. I will disclose any and all information to assist the Group's Compliance Officer's discovery of facts, which may be necessary in its pursuit to successfully resolve a compliance issue.

Yes No

3. During my employment with the Group, I will report immediately to my Supervisor/Manager or the Compliance Officer any real or perceived compliance issue that becomes apparent and may significantly impact our:

- Commercial viability;
- Profitability;
- Assets;
- Customers;
- Regulatory or Legal Obligations;
- Environment; and/or,
- Community

Yes No

4. I consent to participate in any and all audits and investigations, as requested by the Group's Compliance Officer. I consent to engage in a variety of techniques to enable the Group's Compliance Officer's discovery of facts, which may include, but are not limited to, the following:

- Being interviewed;
- Having personal and professional items and spaces searched (i.e., office, desk, computer, employee email, my purse, gym bag, etc.)
- Having my conversations recorded;
- Having my image photographed or video recorded;
- Providing a handwriting sample;
- Complying with requests from external auditors or investigators

Yes No

Employee Recitals

I understand that internal compliance audits and compliance investigations are an essential part of the Group's overall compliance program, and I am required to assist any audit or investigation in good faith.

I understand that my failure to comply in good faith with a compliance audit or compliance investigation, as determined by the Group's Compliance Officer, result in disciplinary action, including termination.

I understand that before engaging in any audit or investigation, the Group's Compliance Officer will become aware of applicable federal, provincial, and local laws which, either explicitly or implicitly, impose duties on employers with respect to conducting employee interviews and/or investigations that are conducted when dealing with potential disciplinary matters.

I also understand that there are circumstances where the results of a compliance audit or compliance investigation will not be eligible for protection under the attorney-client privilege.

I consent to have all personal data contained in this form collected, processed, and transmitted as may be required for the purposes of identifying and resolving any actual, perceived, or potential conflict of interest.

I understand that the information on this form is solely for use of the Group and it is considered confidential information.

I accept any further investigations that could be needed as part of any compliance audit or compliance investigation.

Name:

Title:

Supervisor:

Group Company:

Day/Month/Year:

Signature: _____

RETURN THIS SIGNED FORM TO THE GROUP'S COMPLIANCE OFFICER AT COMPLIANCE@CREDITINFO.COM

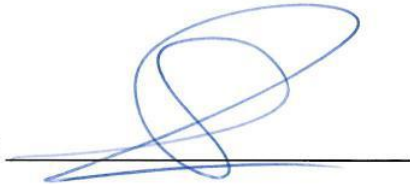
SIGNATURE PAGE

Name: Mr. Stefano M. Stoppani

Title: Creditinfo Group CEO

Date: 9 April 2019

Signature: _____

A handwritten signature in blue ink, consisting of several overlapping loops and a horizontal line at the bottom, positioned above the signature line.